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Attorney for Non-Party JPMorgan Chase Bank, N.A.

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

UNITED STATES, et al.,

Case No. 2:24-CV-04055-JXN-LDW

Plaintiffs,
v.

DECLARATION OF
CHRISTOPHER B. TURCOTTE IN
SUPPORT OF APPLICATION TO
ADMIT COUNSEL PRO HAC VICE

Defendant.

- I, Christopher B. Turcotte, declare pursuant to 28 U.S.C. § 1746:
- 1. I am an attorney-at-law admitted before the Supreme Court of the State of New Jersey, and am a member in good standing of the United States District Court for the District of New Jersey.
- 2. I am a member of Turcotte Law, P.C., attorney for Non-Party JPMorgan Chase Bank, N.A. ("JPMorgan Chase"), in the above-captioned action.
- 3. I submit this declaration in support of the application made on behalf of Non-Party JPMorgan Chase for the *pro hac vice* admission of Marc A. Goldman of Massey & Gail LLP, pursuant to Local Civil Rule 101.1(c).

4. Marc A. Goldman is a partner of the firm of Massey & Gail LLP. Mr. Goldman is

a member in good standing of the Bar of the District of Columbia, and his qualifications are set

forth in his Declaration submitted herewith in support of this application.

5. I agree to sign all pleadings, briefs, and other papers filed with the Court be

responsible for the conduct of this Action, and will be present for all appearances before the Court

unless otherwise excused by the Court.

6. I hereby agree to be responsible for the conduct of Marc A. Goldman, and will

ensure that each attorney complies with Local Rule 101.1(c) should he be admitted pro hac vice.

7. Counsel for Plaintiffs and Defendants have consented to this application and to the

pro hac vice admission of counsel.

8. For the foregoing reasons, I respectfully request that this Court enter an Order

admitting Marc A. Goldman as counsel representing Non-Party JPMorgan Chase pro hac vice in

the above-captioned matter.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this

7th day of October, 2024.

/s/Christopher B. Turcotte

CHRISTOPHER B. TURCOTTE